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Attorneys for Defendant Engineering Support Personnel, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIANA FRANKLIN,

Plaintiffs,

vs.

ENGINEERING SUPPORT
PERSONNEL, INC.

Defendants.

) Case No: 3:20-cv-00698-RCJ-WGC

)

) **STIPULATION AND PROPOSED**
) **ORDER EXTENDING DEADLINE**
) **TO RESPOND TO MOTION TO**
) **DISMISS OR FOR SUMMARY**
) **JUDGMENT**
) (FIRST REQUEST)

)

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Defendant Engineering Support Personnel, Inc., by and through its counsel of record, the law offices of LIPSON NEILSON P.C., and Plaintiff, Diana Franklin, by and through her counsel of record, Terri Keyser-Cooper, hereby submit this Stipulation and Proposed Order pursuant to LR IA 6-1 and states as follows:

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ESP filed a motion to dismiss or in the alternative, for summary judgment, on February 22, 2021 (ECF No. 7). The e-filing response deadline is set for March 8, 2021 (ECF No. 7). Because the motion is styled as "in the alternative for summary judgment," to permit Plaintiff sufficient to respond, the parties stipulate to extend the response time from March 8, 2021 to March 29, 2021.

Current deadline: March 8, 2021

Proposed deadline: March 29, 2021

DATED this 24th day of February, 2021.

LIPSON NEILSON P.C.

By: /s/ Peter E. Dunkley

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*Attorneys for Defendant Engineering Support
Personnel, Inc*

DATED this 24th day of February, 2021.

LAW OFFICE OF TERRI KEYSER-COOPER

By: /s/ Terri H. Keyser-Cooper

TERRI H. KEYSER-COOPER, ESQ.

Nevada Bar No. 3984

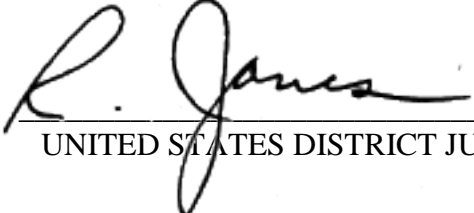
125 Edgewater Parkway

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Attorney for Plaintiff Diana Franklin

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: February 25, 2021.